

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MULTIMEDIA TECHNOLOGIES PTE. LTD.,

Plaintiff,

v.

LG ELECTRONICS INC. AND LG
ELECTRONICS USA, INC.,

Defendants.

Case No. 2:22-CV-00494-JRG-RSP

JURY TRIAL DEMANDED

JOINT MOTION FOR PREFERENTIAL TRIAL SETTING

Plaintiff Multimedia Technologies Pte. Ltd. (“Multimedia”) and Defendants LG Electronics Inc and LG Electronics USA, Inc. (LG) respectfully file this joint Motion.

This case has been set for trial five times: November 18, 2024, January 27, 2025, February 7, 2025, March 3, 2025 and March 17, 2025. The parties received notice from the Court on March 13, 2025 that the case ahead of them would proceed to trial on March 17, 2025 and that the parties were dismissed until the next trial setting in early April. The parties have also been notified that other cases are preferentially set ahead of them for the April 7, 2025 and April 21, 2025 trial settings.

The parties have expended substantial resources securing hotels, office space, and moving trial teams to Marshall for each of the prior settings. The parties understand they may not get reached on either of the April trial settings because of the cases preferentially set that month. Absent a preferential setting in May, the parties will incur additional expenses moving their teams to Texas for the April trial settings.

Plaintiff and Defendants have conferred and confirmed that their respective trial teams and witnesses are available for trial the week of May 5, 2025 whereas the April settings and the latter half of May pose significant conflict issues:

Plaintiff's Conflicts in April and the Second Half of May: Plaintiff's infringement expert has a personal conflict in the latter half of April. Plaintiff's lead counsel has another trial set during the latter half of May in the District of Delaware. One of Plaintiff's local counsel, Chris Bunt, has a personal conflict the second week of June (his daughter is graduating from college and he has prepaid airfare and hotel expenses for that event).

Defendants' Conflicts in April and the Second Half of May: One of Defendants' technical experts has a family member undergoing a surgery in May where the expert needs to support the family member's recovery throughout the second half of May. Defendants' other technical expert is in trial in Canada in late April. Defendants' counsel, Natalie Bennett, is scheduled to deliver remarks for a Judicial Portrait Unveiling at the Federal Circuit on April 25, 2025.

If the Court's schedule permits, the parties would like to try this case the week of May 5.

Accordingly, Plaintiff and Defendants respectfully request that the Court grant them a preferential trial setting for the week of May 5, 2025.

Dated: March 18, 2025

Respectfully submitted,

/s/ Robert Christopher Bunt

Timothy K. Gilman
(admitted pro hac vice)
Christopher M. Gerson
(admitted pro hac vice)
Robert S. Pickens
(admitted pro hac vice)
SCHULTE ROTH & ZABEL LLP
919 Third Avenue

New York, NY 10022
Tel: (212) 756-2000
Fax: (212) 593-5955
Email: tim.gilman@srz.com
Email: chris.gerson@srz.com
Email: robert.pickens@srz.com

Robert Christopher Bunt
Texas Bar No. 00787165
PARKER, BUNT & AINSWORTH PC
100 E. Ferguson St., Suite 418
Tyler, Texas 75702
Telephone: (903) 531-3535
Email: rcbunt@pbatyler.com

*Attorneys for Plaintiff Multimedia
Technologies Pte. Ltd.*

/s/ Melissa R. Smith (with permission)
Collin W. Park
(Admitted *pro hac vice*)
Natalie A. Bennett*
Illinois Bar No. 6304611
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Ave., NW
Washington, DC
201-793-3000 Telephone
201-793-3001 Facsimile
collin.park@morganlewis.com
Natalie.bennet@morganlewis.com

Susan Stradley
Texas Bar No. 24117102
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana St., Suite 4000
Houston, TX 77002-5006
Telephone: 713.890.5151
Facsimile: 713.890.5001
susan.stradley@morganlewis.com

Jason C. White*
Illinois Bar No. 6238352
Nicholas A. Restauri*
Illinois Bar No. 6309995

MORGAN, LEWIS & BOCKIUS LLP
110 N. Wacker Drive, Suite 2800
Chicago, Illinois 60606
Telephone: 312.324.1000
Facsimile: 312.324.1001
jason.white@morganlewis.com
nicholas.restauri@morganlewis.com

Jason E. Gettleman
(admitted pro hac vice)
Austin L. Zuck
(admitted pro hac vice)
Brooke Quesinberry
(admitted pro hac vice)
MORGAN, LEWIS & BOCKIUS LLP
1400 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 843-4000
Facsimile: (650) 843-4001
jason.gettleman@morganlewis.com
austin.zuck@morganlewis.com
brooke.quesinberry@morganlewis.com

*Admitted to practice

Melissa R. Smith
State Bar No. 24001351
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gilliamsmithlaw.com

James Travis Underwood
Texas Bar No. 241020587
GILLIAM & SMITH LLP
102 N College, Suite 800
Tyler, Texas 75702
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: travis@gilliamsmithlaw.com

*Attorney for Defendants LG Electronics
Inc. and LG Electronics U.S.A., Inc.*

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on March 18, 2025, a true and correct copy of the foregoing was served on all counsel of record who have consented to electronic service.

/s/ Robert Christopher Bunt

Robert Christopher Bunt

CERTIFICATE OF CONFERENCE

I certify that counsel for Plaintiff Multimedia Technologies Pte., Ltd. communicated with counsel for Defendants LG Electronics Inc. and LG Electronics USA, Inc. on March 18, 2025. This motion is being filed jointly.

/s/ Robert Christopher Bunt

Robert Christopher Bunt